

COMPREHENSIVE SITE SEARCH EXERCISE

1 Special Criteria for the Relocation Site to Meet Their Operational Needs

1.1 The operators under this application have been operating successfully in the timber and relative industry. With the land resumption commenced in late 2019 due to the Kwu Tung North/ Fanling North New Development Area development, it is necessary for them to relocate their business and continue to contribute to the economic developments in Hong Kong. However, many private lands in the Northern New Territories and North West New Territories had already/ would have to be resumed by the Government. There are difficulties for Hong Kong & Kowloon Timber Merchants Association Ltd. (the Applicant/ HKTMA) to identify a suitable site in the vicinity of the existing operation sites. Besides, the following criteria are required to be met for the relocation site in order to comply with their special operational requirements as detailed in **Section 2:-**

1. The **location** of the site is preferably selected in the North District (same district to the existing operation site) to facilitate their operation;
2. The **size** of the site should be similar to the existing operation site in Kwu Tung North;
3. The site must have proper **access** (or no right of way problem) to allow container vehicles, heavy goods vehicles and medium goods vehicles entering the site;
4. The site should not be elongated in **shape** and should have sufficient space for manoeuvring of vehicles;
5. **Price** offer of the site cannot be too high;
6. The site cannot be too close to residential developments - avoid **local objection**;
7. Sites with sensitive **zoning** (i.e. such as Green Belt (GB), Coastal Protection Area, Site of Special Scientific Interest and Country Park) shall not be considered;
8. No substantial pond filling and clearance of vegetation required – **no insurmountable problem**.

2 Difficulty for Site Selection

2.1 However, it is very difficult for HKTMA to identify suitable sites in the North District for their relocation. HKTMA found that those lands within the Categories 1 and 2 areas in the region under TPB Guidelines TPB PG-No. 13F (i.e. Application for Open Storage and Port Back-up Uses under s.16 of the Town Planning Ordinance) were largely occupied by other open storage uses. They had looked for alternative sites at “Open Storage” (“OS”) and “Industrial (Group D)” (“I(D)”) zones but the land price are unaffordable by the affected operators.

2.2 Back in 2020, when the previous 6 affected operators (Batch 1) of the timber industry approached the association, HKTMA had investigated 11 possible sites (excluding the subject Sha Ling site) located in the North District. These possible sites are listed in **Table 1**.

Table 1: Site Search Exercise for Relocation of Affected Operators (Batch 1)

Site	Possible Site Location Submitted	Size (m ²)	Zone & OZP No.	Reasons for Unsuitable for Relocation
1	Lot 569 RP in D.D. 85, Lau Shui Heung Road, Fanling	4,638	GB (S/NE-LYT/19)	Site too small; and GB zone cannot be considered although the site is committed.
2	Lots 1489, 1490, 1492 & 1494 in D.D. 76, Hung Leng Tsuen, Ping Che	3,482	AGR (S/NE-LYT/19)	Site too small; high purchase cost; and site elongated in shape.
3	Lot 115-128, 131-136, 141-144 in D.D. 38, Loi Tung, Fanling	8,574	I(D) & AGR (S/NE-MUP/11)	Land sold before HKTMA committed.
4	Lots 1268 RP & 1275 RP in D.D. 79, Wo Keng Shan, Ta Kwu Ling	4,217	GB (S/NE-WKS/10)	Site too small; GB site; and one of the three landlords does not agree to sell the land.
5	Lots 2465 & 2466 in D.D. 39, Shek Chung Au, Sha Tau Kok	6,253	AGR (S/NE-LK/11)	Site located very close to village houses - local objections
6	Lot 184 in D.D. 87, Hung Lung Hang, Ta Kwu Ling	3,768	AGR (S/NE-HLH/11)	Site too small; and land sold before HKTMA committed.
7	Lots 460, 534, 535 & 536 in D.D. 87, Hung Lung Hang, Ta Kwu Ling	7,014	AGR (S/NE-HLH/11)	False landlord and return deposit paid.
8	Lots 467-471, 484-485 in D.D. 90, Ah Yiu, Ta Kwu Ling	5,265	AGR (S/NE-MKT/4)	Site elongated in shape; and heavy pond filling required.
9	Lots 2643 & 2645 RP in D.D. 39, Luk Keng, Sha Tau Kok	5,833	REC (S/NE-LK/11)	Site very close to CPA and SSSI zones; and unsuitable for rural mills
10	Lots 1159, 1161, 1162, 1167, 1172-3, Tong Hang, Ta Kwu Ling	9,780	AGR (S/NE-TKL/14)	Site access via a one way road which is too narrow for container and HGV.
11	Lot 11 in D.D. 84, Ping Che, Ta Kwu Ling	5,898	AGR (S/NE-TKL/14)	Problem in right of ways.

2.3 However, some of the above sites were too small to accommodate the affected operators. While some of these sites were considered suitable for relocation, they were sold shortly after some time of consideration. The other site options either have poor accessibility or environmental problems and they are not suitable for the rural workshops. Thus, it is extremely difficult for HKTMA to identify suitable sites given the limited supply of private land in the area with right zoning or operational requirements for their rural workshops.

3 The Best Available Site for Relocation of Affected Operators (Batch 1)

3.1 Eventually, HKTMA has identified the subject Sha Ling site located along Lin Ma Hang Road (the Site) as the best available option for the proposed relocation for the following reasons:-

1. The Site has a large site size of more than 10,000m², which will be able to meet the operational need for affected operators, in terms of the number of spaces for loading/ unloading and area for storage and other

ancillary facilities.

2. The Site abutting Lin Ma Hang Road provides good accessibility to allow goods vehicles entering the Site. Right of way disputes will be avoided since the access to the Site will not encroach onto the private lots from the other landowners.
3. Price offer of the Site is within their budget. They have entered a sales agreement with the landowners.
4. The Site is situated within a reasonable distance from the residential settlement. There is no sensitive zoning in the vicinity of the Site. Pond filling or substantial clearance of vegetation is not required.

3.2 A section 16 planning application (No. A/NE-MKT/17) for proposed temporary rural workshop (timber yard and sawmill) covering the entire eastern site and part of the western site (i.e. representing the sites in the eastbound and westbound of Lin Ma Hang Road respectively) was submitted to the Town Planning Board (the Board) on 1.2.2021. It was approved with conditions by the Board on 30.4.2021 (see **Appendix I**).

4 The Best Available Site for Relocation of Affected Operators (Batch 2)

4.1 Subsequently, some sawmill, timber yard and other related rural workshops in Ma Tso Lung would have to be resumed by the Government in the first quarter of 2024. Serawak and Ronca have approached HKTMA on their urgent need for relocation. Similar to the operational criteria from the previous 6 operators (i.e. location, size, access, shape, price, local objection, zoning, and insurmountable problem), the location of the site is preferably to be situated in the North District and the size of the site should be similar to the existing operation site, i.e. 6,269.5m². HKTMA has investigated 5 possible sites (excluding the subject site) located in the North District. These possible sites are listed in **Table 2**.

Table 2: Site Search Exercise for Relocation of Affected Operators (Batch 2)

Site	Possible Site Location Submitted	Size (m ²)	Zone & OZP No.	Reasons for Unsuitable for Relocation
1	Lot 569 RP in D.D. 85, Lau Shui Heung Road, Fanling	6,500	REC (S/NE-TKLN/2)	Access way is too narrow for container vehicles and other heavy goods vehicles.
2	Lots 1489, 1490, 1492 & 1494 in D.D. 76, Hung Leng Tsuen, Ping Che	4,150	AGR (S/NE-HLH/11)	Landowner withdrew site from market before commitment; and right of way cannot be guaranteed
3	Lot 11 in D.D. 84, Ping Che, Ta Kwu Ling	6,800	AGR (S/NE-MKT/4)	Landowners' missing and representatives do not have authority to sign lease documents.
4	Lots 1493 S.B RP, 1499, 1500, 1501 in D.D. 78, Ta Kwu Ling North	2,504	REC (S/NE-TKLN/2)	Land sold before HKTMA committed.
5	Lot 231 RP, 232, 278 S.A, 278 S.B in D.D. 38, Ta Kwu Ling	6,511	AGR (S/NE-MUP/11)	Land sold before HKTMA committed.

- 4.2 However, the above sites were not suitable for relocation due to various reasons such as poor accessibility, right of way problem and land status issues. Eventually, HKTMA proposes a practical and reasonable solution by extending the size of the western site in order to cater the two additional operators. This site extension proposal is a win-win situation which allows the two additional operators to have a place for their continual operation, and allows the cost of constructing relevant required facilities to be shared by more stakeholders.
- 4.3 Although the extension site also falls within the “Agriculture” zone on the Approved Man Kam To Outline Zoning Plan No. S/NE-MKT/4, it is considered less susceptible to the local environment as the proposed storage and workshop uses will be located within the covered structures. The relocation site is conveniently served by local networks (i.e. Lin Ma Hang Road towards Man Kam To Road) and close to the boundary crossing points. Being located close to a main road and with considerable size to accommodate the operational needs of the operators, the application site is the best locational choice.